

YAAKOV M. ROTH  
Acting Assistant Attorney General  
Civil Division

LAUREN E. FASCETT  
Senior Litigation Counsel

MARY L. LARAKERS  
Senior Litigation Counsel  
U.S. Department of Justice  
Civil Division  
Office of Immigration Litigation  
P.O. Box 868, Ben Franklin Station  
Washington, D.C. 20044  
Telephone: (202) 353-4419  
Email: mary.l.larakers@usdoj.gov

*Counsel for Defendants*

**UNITED STATES DISTRICT COURT**

**DISTRICT OF NEVADA**

Ana Gloria Felix,

Plaintiff,

v.

United States Department of State, *et al.*,

Defendants.

Case No. 2:24-cv-00812

Honorable James C. Mahan

**DEFENDANTS' UNOPPOSED MOTION  
TO EXTEND TIME TO ANSWER  
COMPLAINT (Third Request)**

1 Defendants hereby move for a sixty-day extension of time to answer the complaint (ECF  
2 No. 1) until July 8, 2025. This is Defendants' third request for an extension of time to answer to  
3 the complaint. The current answer filing deadline is May 9, 2025. The requested extension of  
4 time is for good cause and based on the following:

- 5 1. Plaintiff brings this action seeking to compel the Department of State (DOS) to  
6 reissue a decision on her son's visa application that a consular officer previously  
7 refused under the Immigration and Nationality Act ("INA") § 221(g), 8 U.S.C.  
8 § 1201(g). ECF No. 1, Compl. ¶ 2.
- 9 2. On July 1, 2024, Defendants moved to dismiss Plaintiff's complaint (ECF No. 14),  
10 and this Court denied Defendants' motion on February 24, 2025 (ECF No. 19).
- 11 3. The administrative processes which had been the ongoing and which were the subject  
12 of this litigation are now complete. Plaintiff's son submitted additional required  
13 information to DOS to assist with the adjudication of his visa, and Plaintiff's son has  
14 been scheduled for a visa interview on June 10, 2025. Accordingly, this action may  
15 soon become moot after the visa interview on June 10, 2025.
- 16 4. Plaintiff, through counsel, indicated that she does not oppose this motion for an  
17 extension of time. To that end, Defendants request an additional sixty days to answer  
18 the complaint, until July 8, 2025, after Plaintiff's son attends his visa interview.  
19

20 YAAKOV M. ROTH  
21 Acting Assistant Attorney General, Civil  
22 Division

23 LAUREN E. FASCETT  
24 Senior Litigation Counsel

25 By: /s/ Mary L. Larakers  
26 MARY L. LARAKERS  
27 Senior Litigation Counsel  
28 U.S. Department of Justice, Civil Division  
Office of Immigration Litigation  
P.O. Box 868, Ben Franklin Station

Washington, D.C. 20044  
Tel: (202) 353-4419  
Fax: (202) 305-7000  
[Mary.l.larakers@usdoj.gov](mailto:Mary.l.larakers@usdoj.gov)

**IT IS SO ORDERED** that Defendants' unopposed motion to extend time to answer complaint (ECF no. 34) is GRANTED. Defendants shall have until **July 8, 2025** within which to respond to the complaint.

DATED: 5/07/2025



DANIEL J. ALBREGTS  
UNITED STATES MAGISTRATE JUDGE